

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MICHAEL CORIN

Plaintiff,

v.

WALGREEN CO.,

Defendant.

Civil Action No.

JURY DEMAND

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that the Defendant, Walgreen Co., removes this case to the United States District Court for the Middle District of Tennessee, Nashville Division, pursuant to 28 U.S.C. §1441 and §1446. The grounds for the removal are as follows:

1. Plaintiff, Michael Corin, filed this action on May 31, 2022, in the Circuit Court of Davidson County, Tennessee. The suit was styled: Michael Corin, Plaintiff v. Walgreen Co., docket number 22C1057. A true and correct copy of the pleading is attached hereto as Exhibit A.
2. The suit was served on the Defendant, Walgreen Co., on June 6, 2022.
3. Other than the filing of the Complaint, no proceedings have taken place in this matter. Walgreen Co. removes this action to the United States District

Court for the Middle District of Tennessee, Nashville Division pursuant to the provisions of 28 U.S.C. §1441 on the grounds that this Court has jurisdiction pursuant to 28 U.S.C. §1332.

4. The Plaintiff, Michael Corin, alleges in the Complaint that he is a citizen and resident of Springhill, Tennessee. (Complaint, ¶ 1). No county of residency or citizenship of Plaintiff is alleged in the complaint. Springhill, Tennessee is in both Maury County, Tennessee and Williamson County, Tennessee. As noted above, the litigation was filed by Plaintiff in Davidson County, Tennessee.

5. Plaintiff alleges that the incident occurred in Coffee County, Tennessee.

6. Walgreen Co. is an Illinois company with a principal place of business in Deerfield, Lake County, Illinois.

7. This dispute is between persons of different states and the amount in dispute between the parties involves a claim by Plaintiff of damages, exclusive of costs and interest, in excess of \$75,000; therefore, it meets the jurisdictional requirements of this Court pursuant to the provisions of 28 U.S.C. § 1332(a).

7. Venue is correct in the United States Middle District Court of Tennessee because Plaintiff's action is alleged to have occurred in the jurisdiction of this District Court and is currently pending in Davidson County, Tennessee.

8. Counsel for this Defendant has served on counsel for Plaintiff a Notice of Removal. Copies of the Notice of Removal and Petition for Removal have been filed in Davidson County Circuit Court by this Defendant within 30 days of service of the Complaint on Defendant.

WHEREFORE, please take notice that Defendant, Walgreen Co., removes the state action currently styled Michael Corin, Plaintiff v. Walgreen Co., Defendant, docket number 22C1057 from the Circuit Court of Davidson County, Tennessee, where it is now pending, to the United States District Court for the Middle District of Tennessee on this the 24th day of June, 2022.

Respectfully submitted,

BARTON, PLLC

/s/ Marc O. Dedman

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, and via email attachment, properly addressed to:

James T. Sullivan
Morgan & Morgan – Nashville PLLC
810 Broadway
Suite 105
Nashville, TN 37212

this 24th day of June 2022.

/s/ Marc O. Dedman
Marc O. Dedman